

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America,

v.

Caswell Senior, *et al.*,

Defendants.

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No. 20 Cr. 626 (PMH)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law, Defendant CASWELL SENIOR, by his attorneys, JAMES KOUSOUROS and STUART GOLD, hereby moves this Court for an Order:

1. Granting the defense leave to file additional motions depending on the outcome of outstanding discovery issues related to the preservation and authentication of text messages provided to the defense pursuant to Fed. R. Crim. P. 16;
2. Suppressing evidence seized pursuant to a warrant to search Mr. Senior's Apple iCloud Account;
3. Directing that the Government reveal any evidence it intends to introduce at trial pursuant to Fed. R. Evid. 404(b) sixty days before trial;
4. Directing the pretrial disclosure of all exculpatory and impeachment material;
5. Permitting the Defendants to file additional motions which may arise from the requests made herein; and
6. Providing any such relief as the Court may deem proper and in the interest of justice.

Dated: New York, NY
March 22, 2022

Respectfully submitted,

/s/ James Kousouros

James Kousouros, Esq.

Stuart Gold, Esq.

The Law Offices of James Kousouros

260 Madison Avenue, 22nd Floor

New York, NY 10016

P: (212) 532-1934

F: (212) 532-1939

james@kousouroslaw.com

stuart@kousouroslaw.com

Counsel for Defendant Caswell Senior